

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION

UNITED STATES OF AMERICA

VS.

CRIMINAL NO. 4:15-cr-050

MICHAEL ALLEN TARVER

**MOTION TO MODIFY BAIL CONDITIONS**

COMES NOW Defendant Billy Michael Allen Tarver, through his attorney, Cynthia Stewart, and files this his Motion to Modify Bail Conditions for the Court's consideration.

1. Defendant was ordered by this Court to leave his vehicle(truck) in Bolivar County.
2. Defendant has a fifth wheel camper/trailer on his property that he and his wife were living in after their house burned.
3. Defendant would like to have his father, Joe Tarver, retrieve his camper trailer from Bolivar County. His wife has discovered some vandalism on the property and wish to avoid damage to the camper/trailer.
4. The camper/trailer can only be moved with his truck, as it has the correct hitch to do so.
5. Defendant requests that his father be able to use Defendant's truck to move the camper/trailer to his father's property in Byram, Mississippi.
6. Defendant's father will drive to Bolivar County in his vehicle, retrieve the truck and trailer and move it to Byram.

7. Defendant's father will then return the truck to Bolivar County and leave it at the Defendant's mother's house for safe keeping.
8. Defendant's father will then return to Byram in his own vehicle.
9. The Defendant will in no way be involved in picking up the truck or moving the camper/trailer.
10. Defendant also requests that his father's friends continue to be able to visit his father at his home. Said friends have been dropping by each others residences to visit each other for several years.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully requests that this Court allow the Defendant's father, Joe Tarver, to move the Defendant's camper/trailer to Byram, Mississippi with the use of the Defendant's truck.

FURTHER, Defendant requests that his father's friends be allowed to continue their visits to his father's home.

This the day 26<sup>th</sup> of June, 2015.

Respectfully submitted,

MICHAEL ALLEN TARVER

By: /s/ Cynthia A. Stewart  
CYNTHIA A. STEWART

SUBMITTED BY:

CYNTHIA A. STEWART (MB#7894)  
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**CERTIFICATE OF SERVICE**

I, Cynthia A. Stewart, do hereby certify that I have this day caused to be filed a true and correct copy of the foregoing document using the Court's CM/ECF system, which sent a true and correct copy of the same to all counsel of record.

**SO CERTIFIED**, this the 26<sup>th</sup> day of June, 2015.

/s/ Cynthia A. Stewart  
Cynthia A. Stewart